

<i>SERFF Tracking Number:</i>	<i>PRUD-126021315</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>The Prudential Insurance Company of America</i>	<i>State Tracking Number:</i>	<i>41462</i>
<i>Company Tracking Number:</i>	<i>IIGHILTC4PART-RP-AR</i>		
<i>TOI:</i>	<i>LTC03I Individual Long Term Care</i>	<i>Sub-TOI:</i>	<i>LTC03I.001 Qualified</i>
<i>Product Name:</i>	<i>Individual Long Term Care Insurance</i>		
<i>Project Name/Number:</i>	<i>ILTC-4 National Partnership/</i>		

## Filing at a Glance

Company: The Prudential Insurance Company of America

Product Name: Individual Long Term Care Insurance  
 SERFF Tr Num: PRUD-126021315 State: ArkansasLH

TOI: LTC03I Individual Long Term Care	SERFF Status: Closed	State Tr Num: 41462
Sub-TOI: LTC03I.001 Qualified	Co Tr Num: IIGHILTC4PART-RP-AR	State Status: Approved-Closed

Filing Type: Form	Co Status: IIGH	Reviewer(s): Marie Bennett
	Author: Raenonna Ransom	Disposition Date: 04/03/2009
	Date Submitted: 02/04/2009	Disposition Status: Approved-Closed

Implementation Date Requested: On Approval  
 Implementation Date:

State Filing Description:

## General Information

Project Name: ILTC-4 National Partnership  
 Project Number:  
 Requested Filing Mode: Review & Approval  
 Explanation for Combination/Other:  
 Submission Type: New Submission  
 Overall Rate Impact:  
 Filing Status Changed: 04/03/2009

Status of Filing in Domicile: Not Filed  
 Date Approved in Domicile:  
 Domicile Status Comments:  
 Market Type: Individual  
 Group Market Size:  
 Group Market Type:  
 Explanation for Other Group Market Type:  
 State Status Changed: 04/03/2009  
 Corresponding Filing Tracking Number:

Deemer Date:

Filing Description:

Individual Long Term Care Insurance - LTC-4 Evolution

## Company and Contact

### Filing Contact Information

SERFF Tracking Number: PRUD-126021315 State: Arkansas  
Filing Company: The Prudential Insurance Company of America State Tracking Number: 41462  
Company Tracking Number: IIGHILTC4PART-RP-AR  
TOI: LTC03I Individual Long Term Care Sub-TOI: LTC03I.001 Qualified  
Product Name: Individual Long Term Care Insurance  
Project Name/Number: ILTC-4 National Partnership/

Karen Smyth, Vice President karen.smyth@prudential.com  
2101 Welsh Road (215) 658-6279 [Phone]  
Dresher, PA 19025 (888) 294-6332[FAX]

**Filing Company Information**

The Prudential Insurance Company of America CoCode: 68241 State of Domicile: New Jersey  
751 Broad Street Group Code: 304 Company Type: Life  
Newark, NJ 07102-3777 Group Name: State ID Number:  
(973) 802-6000 ext. [Phone] FEIN Number: 22-1211670  
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<i>SERFF Tracking Number:</i>	<i>PRUD-126021315</i>	<i>State:</i>	<i>Arkansas</i>
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## Filing Fees

Fee Required?	Yes
Fee Amount:	\$50.00
Retaliatory?	No
Fee Explanation:	
Per Company:	No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
The Prudential Insurance Company of America	\$50.00	02/04/2009	25496960

SERFF Tracking Number: PRUD-126021315 State: Arkansas

Filing Company: The Prudential Insurance Company of America State Tracking Number: 41462

Company Tracking Number: IIGHILTC4PART-RP-AR

TOI: LTC03I Individual Long Term Care Sub-TOI: LTC03I.001 Qualified

Product Name: Individual Long Term Care Insurance

Project Name/Number: ILTC-4 National Partnership/

## Correspondence Summary

### Dispositions

Status	Created By	Created On	Date Submitted
Approved-Closed	Marie Bennett	04/03/2009	04/03/2009

### Objection Letters and Response Letters

Objection Letters				Response Letters		
Status	Created By	Created On	Date Submitted	Responded By	Created On	Date Submitted
Pending Industry Response	Marie Bennett	03/25/2009	03/25/2009	Raenonna Ransom	03/25/2009	03/25/2009

### Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
Re: Filing Status	Note To Reviewer	Raenonna Ransom	03/05/2009	03/05/2009

<i>SERFF Tracking Number:</i>	<i>PRUD-126021315</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>The Prudential Insurance Company of America</i>	<i>State Tracking Number:</i>	<i>41462</i>
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<i>Product Name:</i>	<i>Individual Long Term Care Insurance</i>		
<i>Project Name/Number:</i>	<i>ILTC-4 National Partnership/</i>		

## Disposition

Disposition Date: 04/03/2009

Implementation Date:

Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number: PRUD-126021315 State: Arkansas

Filing Company: The Prudential Insurance Company of America State Tracking Number: 41462

Company Tracking Number: IIGHILTC4PART-RP-AR

TOI: LTC03I Individual Long Term Care Sub-TOI: LTC03I.001 Qualified

Product Name: Individual Long Term Care Insurance

Project Name/Number: ILTC-4 National Partnership/

Item Type	Item Name	Item Status	Public Access
Supporting Document	Flesch Certification		Yes
Supporting Document	Application		Yes
Supporting Document	Health - Actuarial Justification		Yes
Supporting Document	Outline of Coverage		Yes
Supporting Document (revised)	Filing Cover Letter		Yes
Supporting Document	Filing Cover Letter		Yes
Supporting Document	AR Partnership Disclosure Notices		Yes
Supporting Document	AR Partnership Issuer Certification Form		Yes

SERFF Tracking Number: PRUD-126021315 State: Arkansas  
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TOI: LTC03I Individual Long Term Care Sub-TOI: LTC03I.001 Qualified  
Product Name: Individual Long Term Care Insurance  
Project Name/Number: ILTC-4 National Partnership/

## Objection Letter

Objection Letter Status Pending Industry Response  
Objection Letter Date 03/25/2009  
Submitted Date 03/25/2009  
Respond By Date 04/15/2009

Dear Karen Smyth,

This will acknowledge receipt of the captioned filing.

### Objection 1

- Filing Cover Letter (Supporting Document)

Comment: Please correct Cover Letter to read Arkansas in the first sentence (not Oklahoma).

Please feel free to contact me if you have questions.

Sincerely,

Marie Bennett

## Response Letter

Response Letter Status Submitted to State  
Response Letter Date 03/25/2009  
Submitted Date 03/25/2009

Dear Marie Bennett,

### Comments:

Thank you for your review of the above referenced submission.

### Response 1

Comments: We have revised the Filing Cover Letter to correctly reflect the state of Arkansas for the Partnership Issuer Certification form.

We apologize for this error and for any inconvenience it may have caused.

### Related Objection 1

Applies To:

- Filing Cover Letter (Supporting Document)

SERFF Tracking Number: PRUD-126021315 State: Arkansas  
Filing Company: The Prudential Insurance Company of America State Tracking Number: 41462  
Company Tracking Number: IIGHILTC4PART-RP-AR  
TOI: LTC03I Individual Long Term Care Sub-TOI: LTC03I.001 Qualified  
Product Name: Individual Long Term Care Insurance  
Project Name/Number: ILTC-4 National Partnership/

**Comment:**

Please correct Cover Letter to read Arkansas in the first sentence (not Oklahoma).

**Changed Items:**

**Supporting Document Schedule Item Changes**

Satisfied -Name: Filing Cover Letter

**Comment:**

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Should you be in need of any additional information, please do not hesitate to contact me. Thank you! -Rae

Raenonna L. Prince, CLTC, LTCP  
Lead Analyst  
The Prudential Insurance Company of America  
2101 Welsh Road, LTC Unit  
Dresher, PA 19025  
Voice: 800-732-0416 or 215-658-6281  
Fax: 888-294-6332  
E-Mail: raenonna.prince@prudential.com

Sincerely,  
Raenonna Ransom



SERFF Tracking Number: PRUD-126021315 State: Arkansas  
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Product Name: Individual Long Term Care Insurance  
Project Name/Number: ILTC-4 National Partnership/

**Note To Reviewer**

**Created By:**

Raenonna Ransom on 03/05/2009 08:17 AM

**Last Edited By:**

Marie Bennett

**Submitted On:**

04/03/2009 09:49 AM

**Subject:**

Re: Filing Status

**Comments:**

Mr. Shearer:

We would like to obtain status of the review process of this filing.

At your convenience, can you please provide status?

Thank you! -Rae

Raenonna L. Prince, CLTC, LTCP

Lead Analyst

The Prudential Insurance Company of America

2101 Welsh Road, LTC Unit

Dresher, PA 19025

Voice: 800-732-0416 or 215-658-6281

Fax: 888-294-6332

E-Mail: raenonna.prince@prudential.com

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<i>Product Name:</i>	<i>Individual Long Term Care Insurance</i>		
<i>Project Name/Number:</i>	<i>ILTC-4 National Partnership/</i>		

## **Rate Information**

Rate data does NOT apply to filing.

SERFF Tracking Number: PRUD-126021315 State: Arkansas  
Filing Company: The Prudential Insurance Company of America State Tracking Number: 41462  
Company Tracking Number: IIGHILTC4PART-RP-AR  
TOI: LTC03I Individual Long Term Care Sub-TOI: LTC03I.001 Qualified  
Product Name: Individual Long Term Care Insurance  
Project Name/Number: ILTC-4 National Partnership/

## Supporting Document Schedules

### Review Status:

**Bypassed -Name:** Outline of Coverage 02/04/2009  
**Bypass Reason:** N/A  
**Comments:**

### Review Status:

**Satisfied -Name:** Filing Cover Letter 03/25/2009  
**Comments:**  
**Attachment:**  
AR - Filing Letter - Partnership Filing Letter - Revised 3-25-2009.pdf

### Review Status:

**Satisfied -Name:** AR Partnership Disclosure Notices 02/04/2009  
**Comments:**  
**Attachments:**  
GRP 114420 - AR Partnership Disclsoure Form - 11-3-2008.pdf  
GRP 114421- Policy Disclosure Form.pdf

### Review Status:

**Satisfied -Name:** AR Partnership Issuer Certification Form 02/04/2009  
**Comments:**  
**Attachments:**  
AR - Appendix C Issuer Certification Form.pdf  
Part III Inflation Protection.pdf



Karen L. Smyth, FLMI, ACS, AIAA,  
AIRC, CLTC, LTCP  
Assistant Secretary  
Group Insurance

The Prudential Insurance Company of  
America  
Long Term Care Unit  
2101 Welsh Road  
Dresher, Pennsylvania 19025  
Tel 215 658-6279 Fax 888 294-6332

March 25, 2009

The Honorable Julie Benafield Bowman  
Commissioner of Insurance  
Department of Insurance  
1200 West Third Street  
Little Rock, AR 72201-1904

Re.: The Prudential Insurance Company of America  
NAIC #304-68241  
Individual Long Term Care Insurance  
Form Numbers: GRP 114018, et al

Dear Commissioner Bowman:

Enclosed please find a completed state of Arkansas Issuer Certification Form for the Arkansas Long-Term Care Partnership Program pursuant to 42 U.S.C. 1396p(b)(5)(B)(iii) of the Deficit Reduction Act of 2005.

Prudential is requesting to make use of the recently approved Policy and 3% and 5% Automatic Compound Increase Benefit optional riders (GRP 114018, GRP 114020, & GRP 114021, approved by the Department on October 1, 2008, (PRUD-125558856), as a qualified state long term care partnership policy stipulated in the citation provided above. Accordingly, the Certification Form and copies of all relevant documents have been enclosed for your review.

One of the conditions for a policy to meet the definition of a "Qualified Partnership" is that the policy must include automatic compound annual inflation protection for purchasers under 61 years old and some form of inflation for those 61 – 75.

LTC Evolution should meet this requirement without requiring the insured to purchase any addition inflation protection.

Under the NAIC Model Regulation (Section 13.A), a policy that covers a specified percentage of actual charges and does not include a maximum specified indemnity amount is included as an option that provides "meaningful" inflation protection. LTC Evolution provides coverage at 80% of the actual charges, which results in providing increases at the actual rate of Long Term Care inflation as long as the Policy Lifetime Maximum has not been exhausted. Clearly providing increases that are based on the actual charges is more meaningful than providing automatic compound increases that are artificially set at various rates, such as 5%.

The Honorable Julie Benafield Bowman  
March 25, 2009  
Page 2

LTC Evolution allows consumers to match their Policy Lifetime Maximum to the desired level of asset protection. In addition, LTC Evolution provides better coverage than many Partnership policies with a more traditional LTC design, even if the Guaranteed Increase Feature (GIF) offers are declined. For example, compare LTC Evolution with a \$100,000 Policy Lifetime Maximum (no GIF offers taken) to a traditional LTC Partnership policy with a \$50 daily benefit maximum, a 1 year lifetime maximum and 5% Automatic Compound Inflation Protection. Assuming that the daily cost of care is \$150 today, the cost of care in 25 years will be around \$508 per day assuming 5% inflation. In this example, not only would LTC Evolution pay more of the expenses per day (\$406 vs. \$169), but it would also have a higher lifetime maximum (\$100,000 vs. \$61,800). Given this and other similar examples, it is clear that consumers would be less dependent on Medicaid and in a better position to protect their assets with an LTC Evolution policy than with many traditional LTC plans meeting current Partnership s

**Filing Fees.** Our filing fee check in the amount of \$50.00, has been submitted electronically via SERFF.

**Correspondence:** Please correspond directly with my associate if there are any questions concerning this filing.

Raenonna Prince, CLTC, LTCP  
Lead Analyst  
The Prudential Insurance Company of America  
P. O. Box 7907  
Philadelphia, PA 19101-7907  
Voice: (800) 732-0416 or (215) 658-6281  
Fax: (888) 294-6332  
e-mail: raenonna.prince@prudential.com

Very truly yours,



Karen L. Smyth  
Assistant Secretary

Enclosures



THE PRUDENTIAL  
INSURANCE COMPANY  
OF AMERICA

LONG TERM CARE  
CUSTOMER  
SERVICE CENTER

P.O. BOX 8519  
PHILADELPHIA, PA 19176-8519  
TEL 800-732-0416

## SOLICITATION DISCLOSURE FORM

### IMPORTANT CONSUMER INFORMATION REGARDING THE ARKANSAS LONG-TERM CARE INSURANCE PARTNERSHIP PROGRAM

Some long-term care insurance policies sold in Arkansas may qualify for the Arkansas Long-Term Care Insurance Partnership Program (the Partnership Program). The Partnership Program is a partnership between state government and private insurance companies to assist individuals in planning their long-term care needs. Insurance companies voluntarily agree to participate in the Partnership Program by offering long-term care insurance coverage that meets certain State and Federal requirements. Long-term care insurance policies that qualify as Partnership Policies may protect the policyholder's assets through a feature known as "Asset Disregard" under Arkansas Medicaid program.

**Asset Disregard** means that an amount of the policyholder's assets equal to the amount of long-term care insurance benefits received under a qualified Partnership Policy will be disregarded for the purpose of determining the insured's eligibility for Medicaid. This generally allows a person to keep assets equal to the insurance benefits received under a qualified Partnership Policy without affecting the person's eligibility for Medicaid. All other Medicaid eligibility criteria will apply and special rules may apply to persons whose home equity exceeds \$500,000. Asset Disregard is not available under a long-term care insurance policy that is not a Partnership Policy. Therefore, you should consider if Asset Disregard is important to you, and whether a Partnership Policy meets your needs. ***The purchase of a Partnership Policy does not automatically qualify you for Medicaid.***

**What are the Requirements for a Partnership Policy?** In order for a policy to qualify as a Partnership Policy, it must, among other requirements:

- be issued to an individual after January 1, 2008;
- cover an individual who was an Arkansas resident when coverage first becomes effective under the policy;
- be a tax-qualified policy under Section 7702(B)(b) of the Internal Revenue Code of 1986;
- meet stringent consumer protection standards and
- must provide compound annual inflation protection for ages 75 and younger.

If you apply and are approved for long-term care insurance coverage, The Prudential Insurance Company of America (Prudential) will provide you with written documentation as to whether or not your policy qualifies as a Partnership Policy.

**What Could Disqualify a Policy as a Partnership Policy.** Certain types of changes to a Partnership Policy could affect whether or not such policy continues to be a Partnership Policy. If you purchase a Partnership Policy and later decide to make *any* changes, you should first consult with Prudential to determine the effect of a proposed change. In addition, if you move to a state that does not maintain a Partnership Program or does not recognize your policy as a Partnership Policy, you would not receive beneficial treatment of your policy under the Medicaid program of that state. The information contained in this disclosure is based on current Arkansas and Federal laws. These laws may be subject to change. Any change in law could reduce or eliminate the beneficial treatment of your policy under Arkansas's Medicaid program.

**Additional Information.** If you have questions regarding long-term care insurance policies, please contact Prudential. If you have questions regarding current laws governing Medicaid eligibility, you should contact the Arkansas Department of Human Services.

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The Prudential Insurance Company of America  
Long Term Care Customer Service Center  
P.O. Box 8519  
Philadelphia, Pennsylvania 19176-8519  
Tel 800-732-0416

## Policy Disclosure Form

### Important Information Regarding Your [Policy's] [Certificate's] Long-Term Care Insurance Partnership Status

This disclosure notice is issued in conjunction with your long-term care policy:

Some long-term care insurance policies [certificates] sold in Arkansas qualify for the Arkansas Long-Term Care Insurance Partnership Program. Insurance companies voluntarily agree to participate in the Partnership Program by offering long-term care insurance coverage that meets certain State and Federal requirements. Long-term care insurance policies [certificates] that qualify as Partnership Policies [Certificates] may be entitled to special treatment, and in particular an "Asset Disregard," under Arkansas's Medicaid program.

**Asset Disregard** means that an amount of the policyholder's [certificate holder's] assets equal to the amount of long-term care insurance benefits received under a qualified Partnership Policy [Certificates] will be disregarded for the purpose of determining the insured's eligibility for Medicaid. This generally allows a person to keep assets equal to the insurance benefits received under a qualified Partnership Policy [Certificate] without affecting the person's eligibility for Medicaid. All other Medicaid eligibility criteria will apply and special rules may apply to persons whose home equity exceeds \$[500,000]. Asset Disregard is **not** available under a long-term care insurance policy [certificate] that is not a Partnership Policy [Certificate]. **The purchase of a Partnership Policy does not automatically qualify you for Medicaid.**

**Partnership Policy [Certificate] Status.** Your long-term care insurance policy [certificate] is intended to qualify as a Partnership Policy [Certificate] under the *Arkansas Long-Term Care Partnership Program* as of your Policy's [Certificate's] effective date.

**What Could Disqualify Your [Policy] [Certificate] as a Partnership Policy.** If you make any changes to your [policy] [certificate], such changes could affect whether your [policy] [certificate] continues to be a Partnership Policy. ***Before you make any changes, you should consult with [insert name of carrier] to determine the effect of a proposed change.*** In addition, if you move to a State that does not maintain a Partnership Program or does not recognize your [policy] [certificate] as a Partnership Policy [Certificate], you would not receive beneficial treatment of your [policy] [certificate] under the Medicaid program of that State. The information contained in this Notice is based on current State and Federal laws. These laws may be subject to change. Any change in law could reduce or eliminate the beneficial treatment of your [policy] [certificate] under Arkansas's Medicaid program.





The Prudential Insurance Company of America  
Long Term Care Customer Service Center  
P.O. Box 8519  
Philadelphia, Pennsylvania 19176-8519  
Tel 800-732-0416

**Additional Information.** If you have questions regarding your insurance policy [certificate] please contact [insert name of carrier.] If you have questions regarding current laws governing Medicaid eligibility, you should contact the Arkansas Department of Human Services.

**This form and all benefit statements received should be kept with your policy.**

**APPENDIX C**  
**ISSUER CERTIFICATION FORM**  
(relating to Qualified State Long-Term Care Insurance Partnership)

In order to provide the Insurance Commissioner with information necessary to provide a certification for policies, this Issuer Certification Form requires information and a certification from issuers of long-term care insurance policies with respect to policy forms that may be covered under the Qualified Partnership of the State.

An insurance company may request certification of policies from time to time and, accordingly, may supplement this issuer certification form, *e.g.*, as it introduces new long-term care insurance policy forms for issuance.

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**I. GENERAL INFORMATION**

**A. Name, address and telephone number of issuer:**

**The Prudential Insurance Company of America**  
**751 Broad Street, Newark, NJ 07102-3777**  
**800-732-0416**

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**B. Name, address, telephone number, and email address (if available) of an employee of issuer who will be the contact person for information relating to this form:**

**Raenonna Prince**  
**2101 Welsh Road, Dresher, PA 19025**  
**215-658-6281**  
**raenonna.prince@prudential.com**

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**C. Policy form number(s) (or other identifying information, such as certificate series) for policies covered by this Issuer Certification Form (expand the space below as required):**

GRP 114018, GRP 114020, GRP 114021, GRP 114022, GRP 114023, GRP 114019, GRP 114024, GRP 114029, GRP 114027, GRP 114025, GRP 113108, GRP 114028, GRP 114030, GRP 114031

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Specimen copies of each of the above policy forms, including any riders and endorsements, shall be provided upon request.

**II. CERTIFICATIONS**

- A.** I hereby certify that the policy forms listed above are in compliance with Rule 13 and Rule 94 and all other Arkansas statutes and rules regarding long-term care insurance.
- B.** I hereby certify to the best of my knowledge and belief that all producers who sell, solicit or negotiate long-term care insurance products on {insert issuer name's} behalf have received the training required for Partnership policies and that they demonstrate an understanding of the policies and their relationship to public and private long-term care coverage.
- C.** I hereby certify that the answers, accompanying documents, and other information set forth herein are, to the best of my knowledge and belief, true, correct, and complete.

February 4, 2009  
Date

Karen L. Smyth, Assistant Secretary  
Name and title of officer of the Issuer



\_\_\_\_\_  
Signature of officer of the Issuer

### Part III Inflation Protection

Ages Under 61			
	GRP 114018	Policy - Annual Automatic	Compound Inflation
	GRP 114020	Automatic Compound Inflation Benefit – No Maximum	3% compound inflation
	GRP 114021	Automatic Compound Inflation Benefit – No Maximum	5% compound inflation
Ages 61 – 75			
	GRP 114018	Policy - Annual Automatic	Compound Inflation
	GRP 114020	Automatic Compound Increase Benefit	3% compound inflation
	GRP 114021	Automatic Compound Increase Benefit	5% compound inflation
Ages 76+			
	GRP 114018	Policy - Annual Automatic	Compound Inflation
	GRP 114020	Automatic Compound Increase Benefit	3% compound inflation
	GRP 114021	Automatic Compound Increase Benefit	5% compound inflation

<i>SERFF Tracking Number:</i>	<i>PRUD-126021315</i>	<i>State:</i>	<i>Arkansas</i>
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## Superseded Attachments

Please note that all items on the following pages are items, which have been replaced by a newer version. The newest version is located with the appropriate schedule on previous pages. These items are in date order with most recent first.

<b>Original Date:</b>	<b>Schedule</b>	<b>Document Name</b>	<b>Replaced Date</b>	<b>Attach Document</b>
No original date	Supporting Document	Filing Cover Letter	02/04/2009	AR - Filing Letter - Partnership Filing Letter.pdf



**Karen L. Smyth, FLMI, ACS, AIAA, AIRC,  
CLTC, LTCP**  
Assistant Secretary  
Group Insurance

The Prudential Insurance Company of America  
Long Term Care Unit  
2101 Welsh Road  
Dresher, Pennsylvania 19025  
Tel 215 658-6279 Fax 888 294-6332

February 4, 2009

The Honorable Julie Benafield Bowman  
Commissioner of Insurance  
Department of Insurance  
1200 West Third Street  
Little Rock, AR 72201-1904

Re.: The Prudential Insurance Company of America  
NAIC #304-68241  
Individual Long Term Care Insurance  
Form Numbers: GRP 114018, et al

Dear Commissioner Bowman:

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The Honorable Julie Benafield Bowman  
February 4, 2009  
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**Filing Fees.** Our filing fee check in the amount of \$50.00, has been submitted electronically via SERFF.

**Correspondence:** Please correspond directly with my associate if there are any questions concerning this filing.

Raenonna Prince, CLTC, LTCP  
Lead Analyst  
The Prudential Insurance Company of America  
P. O. Box 7907  
Philadelphia, PA 19101-7907  
Voice: (800) 732-0416 or (215) 658-6281  
Fax: (888) 294-6332  
e-mail: raenonna.prince@prudential.com

Very truly yours,



Karen L. Smyth  
Assistant Secretary

Enclosures